

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

UNITED STATES OF AMERICA

v.

**(2) ISMAEL ZAMBADA GARCIA
a/k/a “Mayo”**

§
§
§
§
§
§

Case No. 3:12-CR-849(2)-KC

**DEFENDANT’S RESPONSE TO GOVERNMENT’S
NOTICE OF TRANSFER AND UNOPPOSED MOTION
FOR TOLLING OF SPEEDY TRIAL PROVISIONS**

Defendant, Ismael Zambada Garcia, by and through his attorney, Frank A. Perez, files this Response to Government’s Notice of Transfer and Unopposed Motion for Tolling of Speedy Trial Provisions and would show the Court the following:

1. Defendant does not oppose to the transfer, via a writ of habeas corpus and prosequendum, to the E.D.N.Y;
2. Defendant does not oppose to remain in the custody of the E.D.N.Y. through the completion of proceedings in that matter;
3. Defendant does not oppose to the pending completing of proceedings in the E.D.N.Y. a stay of all further proceedings in this District and to the extent additional hearings must be held here, an excusal of Defendant’s presence from any such hearings; and
4. Defendants does not oppose to a tolling of the provisions of the Speedy Trial Act in this District until the completion of proceedings in the E.D.N.Y.

Defendant respectfully requests this Court to adjourn the status conference currently scheduled on September 9, 2024 at 1:00pm pending his transfer to E.D.N.Y.

Respectfully submitted,

/s/ Frank A. Perez

FRANK A. PEREZ

State Bar No. 00789541

9110 Scyene Rd.

Dallas, Texas 75227

Telephone: 214-828-9911

Email: frankperezlaw@outlook.com

ATTORNEY FOR ISMAEL ZAMBADA GARCIA

/s/ Ray Velarde

RAY VELARDE

State Bar No. 20539950

1216 Montana Ave.

El Paso, Texas 79902

Telephone: 915-532-6003

Email: ray@velardelaw.com

ATTORNEY FOR ISMAEL ZAMBADA GARCIA

CERTIFICATE OF SERVICE

I certify that on the 5th day September, 2024, the foregoing response was filed electronically with the clerk of the United States District Court for the Western District of Texas to be served by the Court's electronic filing system upon the Assistant United States Attorney.

/s/ Frank A. Perez

FRANK A. PEREZ